

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**UNITED STATES OF AMERICA, ex  
rel.**

**CAMERON JEHL,**

**Plaintiffs,**

**v.**

Case No. 3:19cv091-MPM-JMV

**GGNSC SOUTHAVEN LLC D/B/A  
GOLDEN LIVING CENTER-  
SOUTHAVEN, et al.,**

**Defendants.**

**MOTION FOR AWARD OF ATTORNEYS' FEES AND OTHER EXPENSES**

Defendants GGNSC Southaven LLC, GGNSC Administrative Services LLC, and GGNSC Clinical Services LLC (“Defendants”) hereby move for attorneys’ fees and other expenses.

The Motion is supported by the following exhibits and the supporting Memorandum of Law filed herewith:

**Exhibit 1** – Declaration of Robert Salcido in Support Of Defendants’ Application For Attorneys’ Fees And Other Expenses.

**Exhibit A to Exhibit 1** – Biography of Robert Salcido

**Exhibit B to Exhibit 1** – Redacted invoices of Akin Gump Strauss Hauer & Feld LLP

**Exhibit C to Exhibit 1** – Attorney Fees chart

**Exhibit 2** – Declaration of Margaret Sams Gratz in Support of Defendants' Application For Attorneys' Fees And Other Expenses.

**Exhibit A to Exhibit 2** – Redacted invoices of Mitchell, McNutt & Sams, P.A.

**Exhibit B to Exhibit 2** – Expenses incurred by Defendants.

**Exhibit 3** – Declaration of Lily A. North in Support of Defendants' Application for Attorneys' Fees and Other Expenses.

**Exhibit A to Exhibit 3** – Redacted Benesch, Friedlander, Coplan & Aronoff, LLP billing statements.

**Exhibit 4** - Declaration of Paul Killeen in Support of Defendants' Application for Attorneys' Fees and Other Expenses.

**Exhibit A to Exhibit 4** – Redacted monthly statements.

**Exhibit 5** – Declaration of Kynda Almefty in Support of Defendants' Application for Attorneys' Fees and Other Expenses.

**Exhibit A to Exhibit 5** – Redacted monthly billing statements.

**Exhibit 6** – Declaration of Jan G. Ahrens in Support of Defendants' Application for Attorneys' Fees and Other Expenses.

**Exhibit A to Exhibit 6** – Redacted monthly billing statements.

**Exhibit 7** –Declaration of Mark S. Brennan, Sr. in Support of Defendants' Application for Attorneys' Fees and Other Expenses.

**Exhibit 1 to Exhibit 7** – Redacted Woods Rogers Vandeventer Black, PLC's billing statements.

**Exhibit 8** - Declaration of Michael E. Phillips in Support of Defendants' Application for Attorneys' Fees and Other Expenses.

**Exhibit 1 to Exhibit 8** – Redacted Hagwood and Tipton, P. C.'s billing statements.

**Exhibit 9** - Declaration of Holly Rasmussen-Jones in Support of Defendants' Application For Attorneys' Fees And Other Expenses.

**Exhibit A to Exhibit 9** – KDL Discovery invoices.

Wherefore, Defendants respectfully request that the Court grant Defendants' Joint Motion for Attorneys' Fees and Other Expenses.

Date: April 27, 2023

Respectfully submitted,

/s/ Margaret Sams Gratz

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**Administrative Services LLC; GGNSC**

**Clinical Services**

### **CERTIFICATE OF SERVICE**

This is to certify that I, Robert Salcido, one of the attorneys for GGNCS Southaven, LLC individually and on behalf of all Defendants have this day furnished a true and correct copy of the above and foregoing document to the following via ECF filing:

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This 27th day of April 2023.

/s/ Robert Salcido